UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN (DETROIT)

In re:)	
CITY OF DETROIT, MICHIGAN,)	CASE NO.: 13-53846
Debtor.)	CHAPTER 9
))	Hon. Steven W. Rhodes

THE AD HOC COMMITTEE'S LIST OF FACT WITNESSES RELATED TO THE HEARING ON THE CITY'S FOURTH AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS OF THE CITY OF DETROIT

The Ad Hoc Committee (the "Ad Hoc Committee")¹ as holders of those certain bonds (the "DWSD Bonds") issued by the City of Detroit (the "City") for the Detroit Water and Sewerage Department (the "DWSD") hereby identifies the following fact witnesses it may call at the hearing on the *City's Fourth Amended Plan For the Adjustment Of Debts Of The City Of Detroit*, as the same may be amended from time to time (the "Plan").

1. Lawrence J. Bell, Vice President, U.S. Bank National Association. Mr. Bell is the primary account administrator for U.S. Bank in its capacity as the Water and Sewer Trustee for the DWSD Bonds issued by the City. Mr. Bell may appear to offer testimony regarding the DWSD Bonds and related DWSD bond documents (the "DWSD Bond Documents"), the Trustee's powers and duties under the terms of the DWSD Bonds Documents, including the Trustee's fees and expenses for performing same, the City's obligations under the DWSD Bond Documents, the application of the water and sewer systems' revenues under the DWSD Bond

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¹ The Ad Hoc Committee members are BlackRock Financial Management, Inc., Eaton Vance Management, Fidelity Management & Research Company, Franklin Advisers, Inc. and Nuveen Asset Management.

Documents, the payments on, and the outstanding balances of, the DWSD Bonds, the potential impact of the proposed Plan on the DWSD Bonds, and the general administration of the trusts created under the DWSD Bond Documents.

- 2. Any witnesses necessary for rebuttal.
- 3. Any witnesses listed by another party.
- 4. Any 30(b)(6) witnesses designated by another party for depositions.

The Ad Hoc Committee reserves its right to supplement the testimony topics associated with each witness and to amend the witness list, as may be necessary.

Date: May 12, 2014.

/s/ Amy Caton

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Witness List was filed and served by the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter this the 12th day of May, 2014.

/s/ William W. Kannel

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